

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	Cr. No. 21-1419-JB
)	
vs.)	
)	
JAMESON BEGAYE,)	
)	
Defendant.)	

**UNITED STATES' MOTION FOR DOWNWARD ADJUSTMENT
IN DEFENDANT'S OFFENSE LEVEL**

The United States of America files this motion pursuant to U.S.S.G. § 3E1.1(b), and moves the Court for an order for a one level downward adjustment of the Offense Level in sentencing Defendant. As grounds therefor, the United States provides:

1. Pursuant to U.S.S.G. § 3E1.1(a), Defendant clearly has demonstrated acceptance of responsibility for this offense, and Defendant's offense level should be decreased by two levels.
2. Prior to operation of U.S.S.G. § 3E1.1(b), Defendant's offense level is 16 or greater.
3. Defendant has assisted authorities in the investigation or prosecution of this matter by timely notifying authorities of his intention to enter a plea of guilty, thereby permitting the government to avoid preparing for trial and permitting the government and the Court to allocate their resources efficiently.

4. Therefore, pursuant to U.S.S.G. § 3E1.1(b), Defendant's offense level should be adjusted downward by one additional level.

WHEREFORE, the United States respectfully requests a downward adjustment in Defendant's offense level of one additional level for acceptance of responsibility.

Respectfully submitted,

ALEXANDER M.M. UBALLEZ
United States Attorney

Electronically filed March 21, 2023

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I HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will cause a copy of this filing to be sent to counsel for Defendant, Barry Porter.

Electronically filed March 21, 2023

ZACH JONES
Assistant United States Attorney